

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:

Andrew D. Krowsoski and	:	
Karen S. Krowsoski,	:	Case No.: 09-26347-TPA
Debtors	:	
	:	
Ronda J. Winnecur, Trustee	:	Chapter 13
Andrew D. Krowsoski,	:	Related to Docket Document No.1,7
Movants,	:	Docket Document No. 11
	:	Motion No.: WO-1
vs.	:	
	:	
Con Cast Metal Products	:	Filed Under Local Bankruptcy
Respondent	:	Rule 9013.4 Para. 6(c)
	:	
Social Security No. xxx-xx-9719	:	

**MOTION FOR ORDER TO PAY TRUSTEE  
PURSUANT TO WAGE ATTACHMENT**

The above-named Debtor respectfully represents that:

1. Debtor has filed a petition under chapter 13 of title 11 U.S.C. and proposes to pay debts out of his future earnings or wages.

2. Debtor has claimed certain exemptions but has also submitted such portion of his future earnings or other future income to the control of the trustee as is necessary for the execution of the plan.

3. Debtor has proposed a plan under which a portion of his future earnings or wages is to be paid to the trustee for the benefit of creditors, for a bi-weekly total of One Thousand Two Hundred Nine Dollars and Sixty-Nine Cents (\$1,209.69) bi-weekly, for a monthly total of Two Thousand Six Hundred Twenty-One (\$2,621.00) Dollars.

4. The principle source of money for the payment of said claims, demands and debts will be a portion of the future earnings or wages of Debtor, payable by his employer:

CON CAST METAL PRODUCTS  
ATTENTION: PAYROLL DEPARTMENT  
P.O. BOX 816  
MARS, PA 16046

5. Debtor's employer should be ordered to deduct from Debtor's future earning or wages the periodic amount proposed by the plan filed herein, and to pay said amount forthwith to the standing chapter 13 trustee appointed by your Honorable Court and continue such periodic deductions and payments until such time as the plan submitted by Debtor is consummated, or until further order of the Court.

WHEREFORE, Debtor prays that your Honorable Court enter the Order attached hereto directing Debtor's employer to make payments as outlined therein.

Respectfully submitted,

August 31, 2009

/s/Jeffrey S. Golembiewski  
Jeffrey S. Golembiewski, Esquire  
PA I.D. #64373  
David A. Colecchia & Associates  
Law Care  
324 South Maple Avenue  
Greensburg, PA 15601  
Tel: 724-837-1048  
Fax: 724-837-0602